

DEPARTMENT OF THE ARMY OFFICE OF THE DEPUTY CHIEF OF STAFF FOR LOGISTICS 500 ARMY PENTAGON WASHINGTON DC 20310-0500

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MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Installation Hazardous Materials Management Program (HMMP) Implementation

- 1. Reference memorandum, HQDA, DALO-SMP, 18 Jun 97, subject: Hazardous Material Management Program - Council of Colonels (HMMP-CoC) (Encl 1).
- 2. Army policy contained in AR 200-1 and AR 710-2 is to:
- a. Implement a local HMMP that identifies hazardous material management requirements, assigns responsibilities for management, and establishes local operating procedures.
- b. Apply best management practices throughout the hazardous materials life cycle to reduce risk to human health and the environment from hazardous materials. These practices include procurement, production, use, handling, storage, and disposition of hazardous materials.
- c. Comply with Executive Order 12856, Federal Compliance With Right-to-Know Laws and Pollution Prevention Requirements.
- 3. Implementation of these policies is complicated by the multiple chains of command and supply sources that exist on Army installations. In order to establish the required visibility and control over all hazardous materials, MACOMs. must establish procedures to implement centralized hazardous material (HM) management at their installations. As a minimum, those procedures will: .
 - a. Ensure full installation-level visibility of all HM on each installation at any given time. This information must be readily available and include the locations, amounts, and types of HM.
 - b. Ensure the least toxic and least amount of HM essential to mission requirements is acquired, stored, or used.
 - c. Ensure all HM is properly handled, stored, and disposed of, if necessary.

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- d. Plan for implementation of the Hazardous Substance Management System (HSMS).
- e. Provide for adequate staffing of all required HM control activities.
- f. Ensure responsibility for accomplishing the above is clearly defined at each installation. Responsibility may be assigned to an interdisciplinary HM Management Control Group which reports to either the Garrison Commander or the Installation Commander and whose mission is to plan and execute centralized HM management. Membership on this group could include, but is not limited to, the Director of Logistics, Director of Public Works, Director of Contracting, Director of Information Management, Safety Officer, Medical Officer, tenant units, and any others deemed necessary by the Garrison Commander.
- 4. The U.S. Army Concepts Analysis Agency (CAA) Study Report CAA-SR-96-7, Assessment of Logistics and Cost for Hazardous Materials Management Implementation (ALCHMMI) Study (October 1996) identifies the following business management practices as useful in meeting the above requirements: Establish reuse procedures; order by unit of use versus unit of issue; establish centralized issue/storage points; establish centralized hazardous HM cell; establish authorized user/use list; implement tracking system; establish inventory levels at user/operator levels; implement HM training/awareness program. A description of these practices is at enclosure 2. A copy of the CAA study can be obtained as described in enclosure 3.
- program, policy, and doctrinal issues related to implementation of installation-wide HM control and to HSMS fielding. Procedures for submitting issues and lessons learned to the HMMP-CoC will be published by 1Q FY 98.
- 6. The ACSIM, in conjunction with DCSLOG and PM-SBA, is nearing completion of the initial prototype fielding of HSMS and development of the business practices to support it. During FY 96 to FY 97, HSMS has been, or will be, fielded to 22 installations which were nominated by their MACOMs. The current plan, dependent on FY 98-00 resource availability, will deploy HSMS to the remaining installations in accordance with an

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Installation Sequence List (ISL) based on the DA DCSOPS ISL and weighted with environmental factors and feedback from the MACOMs. The ISL is the basis for DA centrally-funded fielding.

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